Documentation of Environmental Indicator Determination
RCRA Corrective Action

Environmental Indicator (EI) RCRAInfo code (CA725)
Current Human Exposures Under Control
Last Revised September 2005

Facility Name: Lilyblad Petroleum, Inc. (Pacific Functional Fluids, LLC)
Facility Address: 2244 Port of Tacoma Road, Tacoma, Washington
Facility EPA ID#: WAD 027543032

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

   __X__ If yes - check here and continue with #2 below.

   _____ If no - re-evaluate existing data, or

   _____ If data are not available - skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI is for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

Media	Yes	No	?	Rationale/Key Contaminants
Groundwater	**X**			VOCs, SVOCs, and carcinogenic PAHs
Air (indoors)[2]			**X**	VOCs?
Surface soil (e.g. ≤ 2 feet)	**X**			VOCs, SVOCs, and carcinogenic PAHs
Surface water		**X**		Contaminated GW not reaching SW - only treated GW is released.
~~Sediment~~				
Subsurface soil (e.g.	**X**			VOCs, SVOCs, and carcinogenic PAHs
Air (outdoors)		**X**		Emissions are treated before being released

_____ If no (for all media) - skip to #6, and enter "YE" status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

__**X**__ If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

_____ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

Approximately 25 chemicals of concern (COCs) have been identified in groundwater and subsurface soils at the Lilyblad facility and on adjacent properties not owned by Lilyblad. COCs include volatile organic compounds (VOCs), semi volatile organic compounds (SVOCs), and carcinogenic polycyclic aromatic hydrocarbons (cPAHs). The concentrations of most COCs exceed cleanup levels established in the Model Toxics Control Act (MTCA) Cleanup Regulation (Chapter 173-340 WAC)

[1] "Contamination" and "contaminated" describes media containing contaminants (in any form NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

[2] Recent evidence (from the Colorado Department of Public Health and Environment, and others) suggests that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants that previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located in or adjacent to groundwater with volatile contaminants) does not present unacceptable risks.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Instructions for Summary Exposure Pathway Evaluation Table:

A. Strike-out specific Media including Human Receptors' spaces for media which are not "contaminated" as identified in #2 above.

B. Enter "yes" or "no" for potential completeness" under each "contaminated" Media -- Human Receptor combination (Pathway).
Note: In order to focus the evaluation to the most probable combinations some potential "contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("__"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** Under Current Conditions)

Contaminated" Media	~~Residents~~	Workers	~~Day Care~~	Construction	Trespassers	~~Recreation~~	~~Food~~
Groundwater		No		Yes	No		
Air (indoors)		Unknown		No	No		
Soil (surface, e.g. < 2 ft.)		No		Yes	No		
Surface Water		No		No	No		
Sediment							
Soil (subsurface e.g., >2 ft)		No		Yes	No		
Air (outdoors)		No		Yes	No		

____ If no, (pathways are not complete for all contaminated media-receptor combinations) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

__**X**__ If yes, (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code

Rationale and Reference(s):

The depth of contaminated soils ranges from one to approximately ten feet below ground surface (bgs). There is no exposed surface soil. Site has been capped with pavement. Depth of contaminated groundwater varies with the season, but is generally less than four feet bgs. Contaminated groundwater extends to approximately ten feet bgs. Contaminant vapors (volatile organic compounds) may be venting from the shallow soils and groundwater into indoor air.

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[3] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

_X__ If no [exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway] - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If yes [exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway] - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "Significant".

_____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

Rationale and Reference(s):

Groundwater and soils have been extensively studied and characterized. The only potential exposure to contaminated groundwater and subsurface soils is during construction activities. During the wet season, groundwater beneath the Lilyblad facility and adjacent properties is very shallow (less than four feet below ground surface). During this time, the potential exposure to contaminated groundwater is high if trenches or shallow excavations are dug. Subsurface soils are contaminated, offering the potential for human exposure during construction. Vapors emanating from contaminated groundwater and soils on site may be migrating into buildings and off-gassing directly to the atmosphere may occur during construction.

Human exposure is currently controlled for groundwater and soils. A worker protection plan will be required to address exposure during construction.

Based upon a review of evidence provided in the Feasibility Study and the ongoing active testing of the pilot Dual Vacuum Extraction (DVE) system, it is unlikely that there is an unacceptable rate of vapor intrusion into the area buildings. These buildings are concrete pop ups on slabs and the slab foundations are considered to be competent. Buildings constructed with single piece slabs that extend beyond the "pop up" walls and are without expansion gaps or other openings to the subsurface have greatly reduced opportunities for significant vapor intrusion.

Also, subsurface vapor intrusion is typically dominated by advective flow of soil-gas being swept inside the buildings because of indoor air pressure. The on-site (Pacific Functional Fluids) and off-site (PW Eagle) buildings have significant openings to atmospheric pressure with either a work bay or warehouse. There would generally be a greatly reduced opportunity for advective flow into the building because the indoor pressures would have equalized with the outdoor pressures and would no longer be lower than in the surrounding environment.

A DVE system has been operating at this site and near these buildings since 2004. DVE is very effective in eliminating vapor intrusion in that it dewaters the vadose zone and creates more opportunity for vapor removal. This work has taken place under various pilot tests and interim actions and has been shown to be highly effective at removing the most volatile of the contaminants (i.e., those most likely to cause a vapor intrusion

[3] If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

problem). The DVE system has already reduced 20 of the 22 soil contaminants to below their cleanup targets in some test areas and has greatly reduced the concentrations of the most volatile compounds that are likely to drive vapor intrusion risks.

The pilot system continues to withdraw contaminated air and water. An agreed order will be negotiated in the fall/winter of 2005 to scale up from the pilot system to cleanup of the whole site, with implementation immediately following. Verification that the indoor air pathway has been remediated may be required as part of compliance monitoring.

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

____ If yes (all significant exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

____ If no, (there are current exposures that can be reasonably expected to be "unacceptable") - continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

____ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and reference(s):

6. Check the appropriate RCRA-INFO status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

_X_ YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Lilyblad Petroleum, Inc. facility, EPA ID # WAD 027543032, located at 2244 Port of Tacoma Road, Tacoma, Washington under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

____ NO - "Current Human Exposures" are NOT "under Control"

____ IN - More information is needed to make a determination

Completed by: __Original Signed by Paul Skyllingstad_____ Date __9/30/05___
Paul Skyllingstad, Hydrogeologist/Project Manager

__Original Signed by Carol Kraege_____ Date __9/30/05___
Carol Kraege, Industrial Section Manager

Supervisor: Original Signed by Carol Kraege Date 9/30/05

Carol Kraege, P.E.
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FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

Documentation of Environmental Indicator Determination
RCRA Corrective Action

Environmental Indicator (EI) RCRIS code (CA750)
Migration of Contaminated Groundwater Under Control
Last Revised August, 2003

Facility Name: LILYBLAD PETROLEUM, INC.

Facility Address: 2244 PORT OF TACOMA ROAD, TACOMA WA

Facility EPA ID #: WAD 027543032

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

   __X__ If yes - check here and continue with #2 below.

   _____ If no - re-evaluate existing data, or

   _____ if data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" [for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)].

Relationship of EI to Final Remedies

While Final Remedies remain the long-term objective of the RCRA Corrective Action program, the EI are near-term objectives which are currently being used as program measures for the Government Performance and Results Act of 1993, (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Is **groundwater** known or reasonably suspected to be **"contaminated"**[4] above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

__X__ If yes - continue after identifying key contaminants, citing appropriate "levels" and referencing supporting documentation.

_____ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels" and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):
Approximately 25 chemicals of concern (COCs) occur in groundwater at the facility, including volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and carcinogenic polycyclic aromatic hydrocarbons (cPAHs). Groundwater has migrated offsite onto adjacent properties not owned by Lilyblad Petroleum, contaminating offsite soils.

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"[5] as defined by the monitoring locations designated at the time of this determination)?

__X__ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"[5]).

_____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the existing area of groundwater contamination"[2]) - skip to #8 and enter "NO" status code, after providing an explanation.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):
Lilyblad recently completed construction/installation of a pair of groundwater interceptor trenches designed to intercept groundwater flowing offsite. The intercepted groundwater is pumped into an onsite treatment system, then treated and discharged to the City of Tacoma storm drain. The trenches/treatment system will prohibit future flow of contaminated groundwater offsite, but contaminated groundwater on offsite properties from past releases at Lilyblad will remain until a final cleanup action plan is developed for the site.

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?
_____ If yes - continue after identifying potentially affected surface water bodies.

[4] "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

[5] "Existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

__X__ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):
Before construction/installation of the groundwater interceptor trenches (see notes for #3), contaminated groundwater discharged into utility corridors (i.e., permeable backfill surrounding utility lines) and ultimately discharged to surface water. Groundwater is now intercepted before it reaches the utility corridors, thereby eliminating discharge of groundwater to surface water.

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be "**insignificant**" (i.e., the maximum concentration[3] of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

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_____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration[3] of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration[6] of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations[3] greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):_____

6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable"** (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented[7])?

_____ If yes - continue after either: 1) Identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water,

[6] As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.
[7] Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR
2) Providing or referencing an interim-assessment,[8] appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological risk assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable"**) - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s):_____
_____

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

__X__ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations, which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination".

_____ If no - enter "NO_ status code in #8.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):
Several wells in the facility's groundwater monitoring well network are currently being monitored to verify that offsite migration of contaminated groundwater is no longer occurring.

8. Check the appropriate RCRA-INFO status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

__X__ YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified.

Based on a review of the information contained in this EI determination, it has been

[8] The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

determined that the "Migration of Contaminated Groundwater" is "Under Control" at the __Lilyblad Petroleum Inc. facility, EPA ID # _WAD 027543032_____ , located at_2244 Port of Tacoma Road in Tacoma, Washington. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater". This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

_____ NO - Unacceptable migration of contaminated groundwater is observed or expected.

_____ IN - More information is needed to make a determination.

Completed by (signature)_____ Date ___8/03_____
(print LINDA PANG, PE_____.
(title) ENGINEER/SITE MANAGER .

Supervisor (signature)_____ Date __8/03_____
(print KAY SEILER_____.
(title) MANAGER, HAZARDOUS WASTE & TOXICS REDUCTION PROGRAM
(EPA Region or State) WASHINGTON DEPARTMENT OF ECOLOGY

Locations where References may be found:

____WASHINGTON DEPARTMENT OF ECOLOGY_____
____SOUTHWEST REGIONAL OFFICE_____
____3000 DESMOND DRIVE_____
____LACEY, WA 98503_____
_____

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